

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzález@mofo.com
3 MORRISON & FOERSTER LLP
4 425 Market Street
San Francisco, California 94105-2482
Tel: 415.268.7000 / Fax: 415.268.7522

5 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
6 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
7 BOIES SCHILLER FLEXNER LLP
8 1401 New York Avenue, N.W.
Washington DC 20005
9 Tel: 202.237.2727 / Fax: 202.237.6131

10 WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
11 SHAWN RABIN (*Pro Hac Vice*)
srabin@susmangodfrey.com
12 SUSMAN GODFREY
13 1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
14 Tel: 212.336.8330 / Fax: 212.336.8340

15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
RESPONSE TO SPECIAL MASTER'S
RECOMMENDATION**

22 v.

23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

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1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
 3 declaration based upon matters within my own personal knowledge and if called as a witness,
 4 I could and would competently testify to the matters set forth herein. I make this declaration in
 5 support of Defendants' Administrative Motion to File Under Seal Their Discovery Letter Brief
 6 ("Letter").

7 2. Defendants file under seal the below documents in accordance with Paragraph
 8 14.4 of the Protective Order, but do not believe any of these documents contain sealable
 9 information:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Special Master's Recommendation ("Response")	Highlighted Portions	Plaintiff (Green)
Chang Decl. Ex. A	Entirety	Collier Law Firm
Chang Decl. Ex. B	Entirety	Richard Jacobs
Chang Decl. Ex. C	Entirety	Plaintiff
Chang Decl. Ex. D	Entirety	Plaintiff

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 19 3. Defendants do not believe the green-highlighted portions of the Response or
 20 Exhibits C or D to the Declaration of Esther Chang ("Chang Declaration") merit sealing, but
 21 Waymo designated this material "Highly Confidential – Attorneys' Eyes Only." Defendants file
 22 this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to
 23 Local Rule 79-5.

24 4. Defendants file Exhibits A and B to the Chang Declaration under seal in order to
 25 provide Collier Law Firm and Richard Jacobs the opportunity to justify their respective
 26 "Confidential" designations for these documents.
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 22nd day of December, 2017 at Washington, District of Columbia

3 _____
4 */s/ Michelle Yang*
5 Michelle Yang
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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: December 22, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ